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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

FREDERICK EVANS,

Plaintiff,

V.

NATIONAL AUTO DIVISION,
L.L.C., ARIEL FREUD, and
DOES 1-25,

Defendants. :

Civil Action No. 15-cv-8714-AET-DEA

**NOTICE OF MOTION
TO DISMISS COMPLAINT
PURSUANT TO
FED. R. CIV. P. 12(b)(6)**

TO: Jeremy Glapion, Esq.
THE GLAPION LAW FIRM, LLC
1704 Maxwell Drive
Wall, New Jersey 07719
Attorneys for Plaintiff

SIR:

PLEASE TAKE NOTICE that on Monday, March 7, 2016, at 10:00 a.m., or as soon thereafter as counsel may be heard, defendants National Auto Division, L.L.C. and Ariel Freud shall move, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, before the United States District Court for the District of New Jersey (Hon. Anne E. Thompson, U.S.D.J.), at the Clarkson S. Fisher Federal Building & United States Courthouse, 402 East State Street, Trenton, New Jersey, for an Order of Dismissal of the Complaint filed by plaintiff Frederick Evans on December 17, 2015, and for such other and further relief as may be just and equitable.

The within motion is based upon the pleadings and prior proceedings in the cause and Defendants' Brief in Support of Motion to Dismiss submitted herewith. A proposed form of Order is also provided.

Dated: February 11, 2016

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By: /s/ Jeffrey M. Garrod
Jeffrey M. Garrod

-and-

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